



United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

April 25, 2022

**BY ECF**

The Honorable Paul A. Crotty  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

4/25/2022

The April 28 conference is adjourned to  
Thursday, July 7, 2022 at 12 noon. Time will be  
excluded through July 7, 2022. SO ORDERED.

**Re: *United States v. Ediberto Santana, et al., 20 Cr. 22 (PAC)***

Dear Judge Crotty:

The Government respectfully writes with the consent of counsel to defendants Ediberto Santana and Carlos Ramirez to provide the Court with a status update and to request that the status conference currently set for April 28, 2022 be adjourned to a date convenient for the Court in July 2022.

At this time, all defendants except for Ediberto Santana and Carlos Ramirez have pled guilty or are expected to plead guilty. No resolution has yet been reached with respect to Santana or Ramirez, although those discussions remain ongoing. The Court has already set a schedule for trial (Dec. 5, 2022), related disclosures, and motions *in limine*, and has resolved the parties' other pretrial motions. Accordingly, in the view of the parties, there is no need to appear for a conference at this time. Of course, should the Court wish the parties to appear, we are happy to do so.

Should the Court grant the requested adjournment, the parties further request that the time between April 28, 2022 and the next conference date be prospectively excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), in the interest of justice. Such exclusion of time is warranted so that parties can discuss possible resolution of the charges in this case without the need for trial and/or prepare for trial.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

by: /s/  
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